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June 17, 2025

**VIA ECF**

Honorable Katharine S. Hayden, U.S.D.J.  
United States District Court  
District of New Jersey  
Frank R. Lautenberg Post Office and U.S. Courthouse  
2 Federal Square, Courtroom 5  
Newark, New Jersey 07101

**Re: *Student Doe #1, et al. v. Noem, et al.*, 2:25-cv-02998 (KSH) (AME)**


Dear Judge Hayden:

I write on behalf of Plaintiffs in the above-captioned matter regarding a proposed schedule for amending the complaint in this action and in anticipation of briefing for a motion to dismiss. After conferring with counsel for the Defendants and with their consent, I submit the following joint proposal:

- Amended Complaint: June 27, 2025
- Defendants' Motion to Dismiss: August 4, 2025
- Plaintiffs' Opposition to Motion: September 10, 2025
- Defendants' Reply: September 24, 2025

We appreciate the Court's consideration of this schedule and are prepared to make adjustments if the Court requires.

Respectfully submitted,

  
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Jeanne LoCicero

**American Civil Liberties Union  
of New Jersey Foundation**

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*\* application for admission forthcoming*

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cc: All counsel of record via ECF